

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MATTHEW GAMEWELL,

Plaintiff,

V.

LAFAYETTE WORK CENTER, INC.,

Defendant.

[illegible]

Cause No. 4:21-cv-00523-SEP

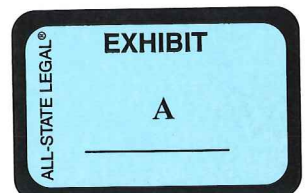
PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST INTERROGATORIES

COMES NOW Plaintiff, by and through counsel, and provides his responses and objections to Defendant's Interrogatories:

INTERROGATORIES

1. State whether Plaintiff has been employed or engaged in any gainful activity, during the period June 5, 2020, until the present; if the answer is in the affirmative, with respect to all such employment, including self-employment, state:

- a) the name(s) and address(es) of each employer;
- b) the dates such employment started and ended (if applicable);
- c) the job classification(s) or position(s) held;
- d) the hourly rate of pay or salary received;
- e) the hours worked per week;
- f) the total earnings; and
- g) the reason(s) for termination of such employment, if applicable.



9. State whether Plaintiff sought medical or psychological treatment, counseling, or therapy in connection with any injury or condition for which Plaintiff is seeking damages in this lawsuit. If so, state:

- a) the health care provider's name, address, phone and area of specialty;
- b) the dates of treatment or consultation;
- c) the symptoms that caused you to seek treatment or consultation;
- d) the diagnosis and/or prognosis; and
- e) the amount you and/or your health insurance company paid for such treatment or consultation.

ANSWER:

(c) Because of the abuse I was forced to endure, I was stressed all day. I would cry after work and I had difficulty sleeping. I no longer looked forward to work. I had to go to the emergency room while I was still employed. I went to St. Clare Hospital in Fenton, Mo.

(d) I was diagnosed with anxiety that started with Kim Lamb and Rob Libera at St. Clare Hospital.

I also overheard the police call me retarded and autistic and that I would not be believed. This was very upsetting to me.

(a)(b) Agape Christian Counseling Services
Byron Loy, LCPC (IL), LPC (MO), CRADC
11600 Manchester Road Ste 101
DesPeres MO 63131

I started therapy sessions with Byron Loy while still employed at Lafayette. Bryon Loy works for Agape Christian Counseling.

I and Byron Loy did phone sessions due to the COVID restrictions. Byron was in a car accident and sessions were stopped. By then, I was suspended and did not have to deal with the harassment at work.

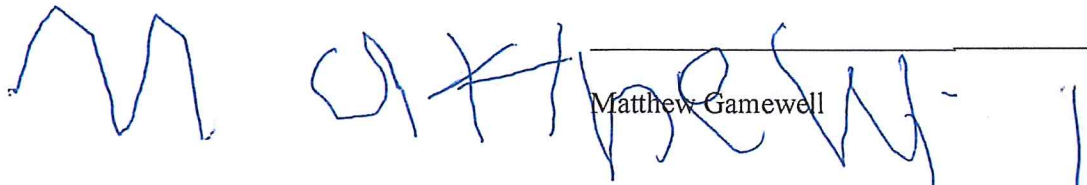
(c) I have a condition known as Jou Berts which caused me to have a micro penis. To urinate, I have to pull down my pants instead of just unzipping them. I started noticing Kim Lamb standing there while I urinated. I was very uncomfortable. I do not need any assistance in the restroom and this infringement on my privacy was very upsetting

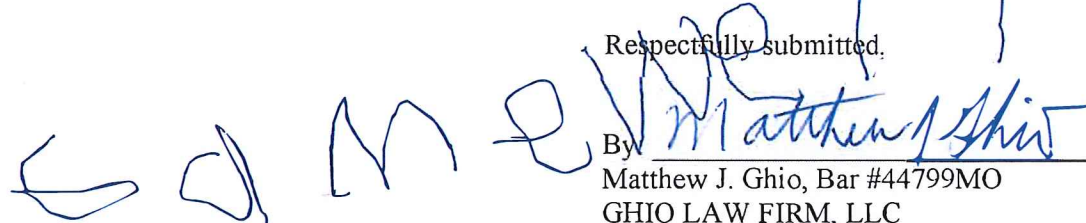
to me. The fact that Rob Libera basically ignored the complaint when my mom came in for a meeting showed a total lack of common respect and decency. When the abuse started, it was overwhelming for me. I had trouble trying to conceive why I was being treated this way.

(e) I don't know the amounts paid by me or the insurance company for the counseling

DECLARATION

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Matthew Gamewell


Respectfully submitted,
By Matthew J. Ghio
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ATTORNEYS FOR PLAINTIFF

Certificate of Service

I hereby certify on this 23rd day of August, 2021, a true and correct copy of the foregoing was sent via the CM/ECF System or by electronic mail, to attorneys for Defendant, Robert D. Younger, Christine S. Coleman, 2730 N. Ballas Road, Suite 200, St. Louis, MO 63131-3039, younger@mcmahonberger.com or coleman@mcmahonberger.com.


Matthew J. Ghio